EXHIBIT A

(

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

LESLIE CLABO,)	y.
Plaintiffs,))	FILEDE
v.) No. 1-223-13	2013 MAY 6 PM 12
)	- CATHERINE F. QUIS
OHNSON & JOHNSON HEALTH CARE SYSTEMS, INC., and)	CIRCUIT COURT CLE
ETHICON ENDO-SURGERY, INC. f/k/a)	
ETHICON, INC.)	
Defendants.)	
		.
SUMMO		Eg Carl
FO: Johnson & Johnson Health Care Systems C.T. Corporate Systems	s, Inc.	
800 S. Gay Street, Suite 2021		
Knoxville, TN 37929		
By:	Clerk : Deputy Cle	Sharts.
(This summons is issued pursuant to Rule 4 of the	he Tennessee Rules of Civil Procedure.)) = 1 m
NOTICE	E SC	
TO THE DEFENDANT (S): Cennessee law provides a ten thousand dollar (\$10,000.00) personal proper		E G
udgment should be entered against you in this action and you wish to claim tems you wish to claim as exempt with the clerk of the court. The list mecessary; however, unless it is filed before the judgment becomes final, it prior to the filing of the list. Certain items are automatically exempt by law apparel (clothing) for yourself and your family, and trunks or receptacles neuto school books. Should any of these items be seized you would have the ri	property as exempt, you must file a writt hay be filed at any time and may be chang it will not be effective as to any execution and do not need to be listed; these include it excessary to contain such apparel, family p	en list, urder oath, of the ged by your-thereafter as n of garnishment issued ems of necessary wearing ortraits, the family Bible,
or how to exercise it, you may wish to seek the counsel of a lawyer.		
Received this	2 Alinear HAT	36. Deputy Sheriff
<u>return on service</u> Served	Special Assistant Secrett	
hereby certify and return that on the day of	n the Registered Agent for	ether with the
Cricker Erry Everan	4 9	
complaint as follows: ricka Fry System	1 . Halt C	A The
complaint as follows: ricka Fry System	hison Healt care Si	stems Ing. 01264
complaint as follows: ricka Fry System	husin Health care Signature of A	5/864

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

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LESLIE CLABO,	
Plaintiffs,	FILEDE
v	No. /-223-13 2013 MAY 6 PM 12
JOHNSON & JOHNSON HEALTH CARE	CATHERINE F. QUIS'
SYSTEMS, INC., and	CIRCUIT COURT CLEF
ETHICON ENDO-SURGERY, INC. f/k/a ETHICON, INC.	
ETHICON, INC.	·
Defendants.	
SUMMO	NS
TO: Johnson & Johnson Health Care Systems,	Inc.
C.T. Corporate Systems 800 S. Gay Street, Suite 2021	
Knoxville, TN 37929	
You are hereby summoned and required to serve upon: Richar Knoxville, Tennessee 37901-1481, a true copy of the answer to within 30 days after service of this summons upon you, exclu with the Court. If you fail to do so, judgment by default will complaint. Issued this	o the complaint which is herewith served upon you, sive of the day of service. You will file the original
Ву: _	Reserve Clerk Clerk
(This summons is issued pursuant to Rule 4 of the	Tennessee Rules of Civil Procedure.)
NOTICE TO THE DEFENDANT (S):	
Tennessee law provides a ten thousand dollar (\$10,000.00) personal property judgment should be entered against you in this action and you wish to claim pritems you wish to claim as exempt with the clerk of the court. The list may necessary; however, unless it is filed before the judgment becomes final, it is prior to the filing of the list. Certain items are automatically exempt by law and apparel (clothing) for yourself and your family, and trunks or receptacles nece and school books. Should any of these items be seized you would have the right or how to exercise it, you may wish to seek the counsel of a lawyer.	roperty as exempt, you must file a written list, under oath, of the be filed at any time and may be changed by your thereafter as will not be effective as to any execution of garnishment issued do not need to be listed; these include items of necessary wearing ssary to contain such apparel, family portraits, the family Bible,
Received this day of, 20,	, Deputy Sheriff
RETURN ON SERVICE O	
I hereby certify and return that on the day of	, 20, I served this summons together with the
complaint as follows:	
SI	neriff-Deputy Sheriff
Conv	

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Circuit Court Clerk

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nT		IN THE CIRC	CUIT COURT	FOR KNOX C	OUNTY, TENNESSE	E	FIL	E D _a
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		Plaintiffs,)		GATRE	NNE	E OII
	v.	r')	No. 1-223-1	ofReut	COU.	RT CL
	ETHI	ISON & JOHNSON SYSTEMS, INC., a CON ENDO-SURGI CON, INC.	nd)			ن -	
		Defendants.)			100 144 143	
			SU	JMMONS			6.3	
	TO:	Ethicon Endo-Surg	=	Ethicon, Inc.			3	
		C.T. Corporate Sys 800 S. Gay Street, S Knoxville, TN 3792	Suite 2021				رب رب س	
	Knoxvi within 3	lle, Tennessee 37901-148: 30 days after service of the Court. If you fail to do int. Issued this day of	t, a true copy of the is summons upon so, judgment by do	e answer to the co you, exclusive of efault will be take , 20 13 at By:	er, Plaintiff's attorney, Post complaint which is herewith a the day of service. You wil an against you for the relief o'clock M Clerk Clerk Deputy Clerk	served upon you, I file the original		
		(This summons	is issued pursuant to l	Rule 4 of the Tenness NOTICE	ee Rules of Civil Procedure.)			
	TO THE	DEFENDANT (S):		NOTICE				
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		COUNTY, IMI			FILE
LESLIE CLABO,)			2013 MAY	6
Plaintiffs,)	No. 1-20	13-13	CATKEE CIRCUIT	NINE Cour
JOHNSON & JOHNSON HEALTH CARE SYSTEMS, INC., and ETHICON ENDO-SURGERY, INC. f/k/a ETHICON, INC.)				
Defendants.)				
CO: Ethicon Endo-Surgery, Inc. f/k/a Ethi C.T. Corporate Systems 800 S. Gay Street, Suite 2021 Knoxville, TN 37929	con, Inc.				
You are hereby summoned and required to serve upon: It is a true copy of the ans within 30 days after service of this summons upon you, with the Court. If you fail to do so, judgment by default omplaint. Issued this day of	swer to the co exclusive of t will be take	omplaint which is I the day of service. n against you for the o'clock	rerewith served You will file the relief deman	upon you, he original	
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Circuit Court Clerk

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

LESLIE CLABO,)	Russkella e
Plaintiffs,)	FILED CK
v.)	No. 1-22 Start 6 FT 17.51
JOHNSON & JOHNSON HEALTH CARE)	GINDUIT COURT CLERK
SYSTEMS, INC., and)	VINSON COOK! CLERK
ETHICON ENDO-SURGERY, INC. f/k/a)	
ETHICON, INC.)	
)	
Defendants.)	

COMPLAINT

COMES now Plaintiff, Leslie Clabo, by and through counsel, and files suit against the Defendants, Johnson & Johnson, and Ethic on Endo-Surgery, Inc. f/k/a Ethicon, Inc., and for cause of action would show unto the Court the following:

- 29
- 1. That the Plaintiff Leslie Clabowas at all times relevant a resident citizen of Knoxville, Knox County, Tennessee.
- 2. That Defendant Johnson & Johnson., is a New Jersey corporation, doing business at 425 Hoes Lane Piscataway, NJ 08854-4103, and who directed its products into Tennessee, has designated C.T. Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929-9710, as its agent for service of process.
- 3. On information and belief, That the Defendant Ethicon Endo-Surgery, Inc., f/k/a Ethic on, Inc., is an Ohio corporation, which on information and belief is the wholly-owned subsidiary of defendant Johnson & Johnson whose agent for service is C.T. Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929-9710.

Page 1 of 4

ATTEST

Certified a True Copy

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(12/12 Page 6 of 10 Page ID #: 12

- 4. That the Defendant(s) Johnson & Johnson and Ethicon Endo-Surgery, Inc., were at all times material the manufacturer and sellers of transvaginal mesh which were introduced into the stream of commerce during 2003 and thereafter, and at all times relevant to the allegations made herein.
- 5. That at all times the Plaintiff was prescribed a transvaginal mesh TVT sling procedure and on May 8, 2003 at Fort Sanders Parkwest Medical Center "Kit Device TVT w. Abd. Guide, Catalog # 610041A, Lot No. JCG03072 or (JOG03072), Item No. 70675" was implanted by her surgeon.
- 6. That periodically beginning about 2006 Plaintiff began to experience medical problems including pelvic pain,, infections, and others. On July 27, 2011, Plaintiff had to have additional surgeries for removal of a parts of the sling which had perforated tissue into her vaginal walls, the remaining mesh is continuing to perforate tissues and cause significant pain and other problems as a result, including mesh erosion, perforation into the other body parts, pelvic pain, urinary problems, scarring, dyspareunia, and neuropathic pain.
- 7. Plaintiff alleges she was unaware her continuing problems were associated with a defective product, and specifically the mesh until after July 27, 2012 when she was advised by a medical doctor friend of the probable association of TVT mesh and her continuing problems,
- 8. Plaintiff alleges she has never received any communication from the Defendants regarding any problems associated with this product.
- 9. That at all material times the Defendants owed a duty of reasonable care to manufacture a reasonable safe product to include adequate designing, testing and inspecting its products before sale, and to warn of known or learned of dangers associated with its products.

- 10. That at all material times the Defendants owed a duty not to introduce into the stream of commerce, including Tennessee, products which are defective or unreasonably dangerous to the consumer and may be liable to Plaintiffs under the Tennessee Products Liability Act, as codified at T. C.A. § 29-28-101, et seq.
- 12. That the Defendants, on information and belief, at all times material has misled the medical community regarding the safety and efficacy of the product, and that the product had "elastic properties that allow adaptation to physiological stresses" which it did not and as a result the product can perforate other organs and tissues causing the pain and the need for additional surgical procedures, which Plaintiff has had to undergo.
- 13. That as a direct and proximate result of the actions of Defendants, in placing an unreasonably dangerous and defective product on the market, the Plaintiff sustained serious harm including but not limited to abdominal and vaginal pain, recurrent infections, urinary issues, scarring dyspareunia and other problems, she has incurred and will incur additional medical expenses, and the loss of quality of life and mental anguish.
- 14. That the Defendants did intentionally misrepresent to the public the safety and efficacy of its product the TVT mesh, and intentionally and with callous disregard for the rights and safety of patients did place into the stream of commerce a product which had not been tested in human subjects, instead misrepresenting to doctors and patients that the product was "substantially equivalent to earlier approved devices" which had been demonstrated to be safe "through other tests." The product is unreasonably unsafe and Defendants intentionally misleading the public regarding the safety and efficacy of its products, and exposing Plaintiff and others to dangers which she was not required to otherwise encounter, which should subject the defendant to punitive

damages.

WHEREFORE, premises considered, Plaintiff Leslie Clabo sues each of the Defendants for the sum of Four Million Dollars (\$4,000,000.00), plus Five Million Dollars (\$5,000,000) exemplary damages and Plaintiff demands a trial by jury plus costs of this cause.

Respectfully submitted this U

day of May, 2013.

LAW OFFICE OF RICHARD BAKER

RICHARD BAKER (BPR #013152)

Attorney for Plaintiff

Post Office Box 1481 Knoxville, Tennessee 37901-1481 (865) 633-6066

IN THE CIRCUIT COURT OF KNOX COUNTY, TENNESSEE STATE OF TENNESSEE

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). Plaintiff(s)	No 1-223	ALDAHIT AZ	IE F. QUIST DURT CLERK
Johnson & Johan et al.	No 1 ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	<u>· 10</u>	
Defendant(s)	***		
COST BOND			
1 Kestie Claho			
as Principal(s), and Lithard Bucon as Surety, are held and firmly bound unto the Circ Tennessee for the payment of all costs awarded agbind ourselves, our heirs, executors and administration	painst the principal. To that and	y, , we	
The Principal(s) is/are commencing legal recounty, Tennessee. If the Principal(s) shall pay all them then this obligation is void. If the Principal(undertake to pay all costs adjudged against the Pri-120 et seq.	ll costs which are adjudged agai	inst .	
PRINCIPAL(S) Lestie Cab a (Print or Type) Principal	Lil Rhen p	Leshi ah	
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(Print of Type) SURETY	Knoxuille, 70	3790)-1487	ATTEST STUDENTS
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